

December 14, 2012



Michelle Kerr Remedial Project Manager U.S EPA – Region 5 77 W. Jackson Blvd. Mail Code: S-6J Chicago, IL 60604-3590

Re: Response to USEPA Comments Regarding Additional Groundwater Studies Report

United States of America v. AK Steel Corporation et. al.

Case No. 1:10-cv-00996-KMO

Chemical Recovery Systems Site, Elyria, Ohio

Dear Ms. Kerr:

On October 9, 2012, Steerman Environmental Management & Consulting ("Steerman Environmental"), on behalf of the Chemical Recovery Systems, Inc. ("CRS") Site Remedial Design/Remedial Action ("RD/RA") Group Settling Performing Defendants ("Group"), submitted a draft Additional Groundwater Studies ("AGWS") Report to U.S. EPA. In a letter dated November 15, 2012, U.S. EPA provided questions and comments on the draft report. CRS RD/RA Group consultants, Brown and Caldwell, Inc. ("Brown and Caldwell") and EHS Support ("EHS"), reviewed U.S. EPA comments and prepared draft responses that were discussed during a December 12, 2012 conference call between U.S. EPA, CRS RD/RA Group members, Brown and Caldwell, EHS, and Steerman Environmental. Based on a discussion of the draft responses, and additional comments provided by U.S. EPA during the conference call, Brown and Caldwell prepared the attached response to U.S. EPA comments and the Final AGWS Report. A "red-line" version of the Final AGWS Report text, which highlights changes to the October 9, 2012 report, was provided to you electronically on December 13, 2012.

If you have any questions regarding the response to U.S. EPA comments or the revised AGWS Report, please feel free to contact the undersigned at (770) 992-2836, or by electronic message to psteerman@charter.net.

Best Regards,

Patrick S. Steerman

CRS Site Project Coordinator

ec: Larry Antonelli, Ohio EPA (electronic copy)

Richard Karl, Director, Superfund Division EPA Region 5 (electronic copy)

Nigel Goulding, EHS Support (electronic copy)

Larry Mencin, CRS RD/RA Group, Technical Committee Chair, (electronic copy)

Doug McWilliams, CRS RD/RA Group Counsel Tom Nash, Esq., U.S. EPA (electronic copy)

Mike Watkins, Brown & Caldwell (electronic copy)

CRS RD/RA Group